

Exhibit A

Examples of Plaintiffs' Scope Limitations	Examples of Defendants' General Objections
<p>5. <i>Privilege.</i> Plaintiffs will not produce information protected from disclosure by the attorney-client privilege or the attorney-work product doctrine, or any other applicable privilege or protection provided by law. Any documents withheld from production on such grounds will be identified on a privilege log in accordance with the ESI Protocol entered by the Court.</p>	<p>6. Smithfield objects to each Request, Definition, or Instruction to the extent it seeks information or documents protected from disclosure by the attorney-client privilege, the attorney-work-product immunity, or any applicable privilege, protection, doctrine, or immunity. No response below should be construed as a waiver of any applicable privilege, protection, doctrine, or immunity. Smithfield does not intend to produce privileged or protected documents or disclose any privileged or protected material, and any production of such documents or disclosure of such material is inadvertent, unless Smithfield expressly indicates a contrary intent in a writing accompanying its responses.</p>
<p>4. <i>Time Period.</i> Unless otherwise indicated, Plaintiff will collect, search for and produce responsive documents for the time period of January 1, 2008 through June 30, 2018 (“the Relevant Time Period”).</p>	<p>8. Clemens objects that the “relevant time period” as defined by these Requests—in seeking documents through August 17, 2018—goes beyond the parties’ agreement that the relevant time period ends June 30, 2018, a point Plaintiffs concede. <i>See</i> B. Clark March 15, 2019 letter. Clemens reserves its right to raise any additional objections to the “relevant time period” should the Court grant all or part of the Defendants’ Motions to Dismiss on statute of limitations grounds.</p> <p>IPC objects because the “Relevant time period” as defined by these Requests—in seeking documents through August 17, 2018—goes beyond the parties’ agreement that the relevant time period ends June 30, 2018, a point Plaintiffs concede. <i>See</i> B. Clark March 15, 2019 letter. Unless otherwise specified, IPC will agree to produce documents beginning January 1, 2008 through June 30, 2018, but this is subject to revision should the Court grant all or part of IPC’s motion to dismiss.</p>

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<p>6. Search Methodology. Unless otherwise indicated, Plaintiffs will cull ESI in accordance with the parties' discussions regarding search methodology, which are anticipated to take place in the coming months.</p>	<p>4. Smithfield objects to any request seeking "all" documents on the grounds that Smithfield cannot guarantee that it has located every single document located anywhere in the company that might be responsive to a particular request. Such a request, if interpreted literally, would seek documents and ESI far beyond the scope of a reasonable search of appropriate custodian files and non-custodial sources and would seek information that is not reasonably accessible and not proportional. Plaintiffs' counsel acknowledged during the parties' March 8, 2019 meet and confer that Smithfield is not required to search for and produce "All Documents" from all possible sources or locations under the Federal Rules. See also B. Clark March 15, 2019 letter. Smithfield will respond to any request seeking "all" documents by conducting a reasonable search of the reasonably accessible files of certain custodians and certain sources using a search methodology (that may include search terms or TAR) that it decides to use. Smithfield will not search for or produce documents beyond these sources or for documents that are not captured in the results of any search term or TAR. Smithfield reserves the right to amend its objections and responses to the Requests after custodians, non-custodial document sources, and search terms have been agreed or ordered. Smithfield further reserves the right to redact documents produced in response to the Requests as appropriate and as permitted by this Court's orders.</p> <p>5. For the avoidance of doubt, Smithfield's offer to produce categories of documents below is expressly contingent upon the search for responsive documents being reasonable, limited to a reasonable number of agreed-upon custodians and sources, and the further use of review technologies to isolate potentially relevant</p>

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	information and lessen undue burden. Information that is not reasonably accessible is not subject to Smithfield's offer to search for responsive documents.